

# **EXHIBIT E**

**Stowe, William**

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**From:** Stowe, William  
**Sent:** Thursday, January 4, 2018 10:45 AM  
**To:** 'Leeor Neta'; docketing; Samantha Everett; Jake Bernstein  
**Cc:** Babcock, Chip; Kevin J. Curtis (kjc@winstoncashatt.com); Brown, Matthew D.; Durbin, Christopher; Smith, Amy McCowan; chung@cmmlaw.com; litigation@cmmlaw.com  
**Subject:** RE: River City v. Kromtech Alliance Corp., et al.; Dates for Telephonic Hearing on Motion for Protective Order

Leeor:

Unfortunately, we cannot agree to an extension of the amendment date by 30 days. CXO submitted its responses and objections all the way back on November 28, 2017. Separately, as the Court instructed, CXO worked with the parties to try and come up with a solution regarding confidentiality. Plaintiffs not only opposed the agreement that we drafted but flatly opposed any confidentiality with no justification. You have had since November 28, 2017 to take up with the Court any issues you claim regarding CXO's production. To date, you have chosen not to do so. I also note that we have proposed many dates for a hearing on our separate motion for protective order that are well before the February 14, 2018 deadline for any motion to amend pleadings. Even if we hadn't, or even if a hearing could not be held until after February 14, 2018, I can't help if you have decided to not to take up with the Court any issues you claim with CXO's production since November 28<sup>th</sup>. We are very reasonable and accommodating. However, dragging out the deadline another 30 days, which would require dragging out the other deadlines that feed off it, such as the deadline for a renewed motion to dismiss and the hearing that will result from that motion to dismiss, makes little sense, particularly in the context of a personal jurisdiction fight where the whole point is that the defendant should not have to be in the forum litigating in the first place.

As to the issue of proposed hearing dates, if we do not hear from you by noon Pacific today regarding availability for a telephonic hearing date as I originally requested, I will put in the motion that you would not provide me a date and we will select a date that is convenient to the Court, us, and other parties. Thanks.

Sincerely,

William J. Stowe  
Jackson Walker L.L.P.  
1401 McKinney, Suite 1900  
Houston, Texas 77010  
Direct: (713) 752-4360  
Fax: (713) 308-4116  
E-Mail: wstowe@jw.com

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From: Leeor Neta [mailto:Leeor@newmanlaw.com]

Sent: Wednesday, January 3, 2018 2:39 PM

To: Stowe, William <wstowe@jw.com>; docketing <docketing@newmanlaw.com>; Samantha Everett <samantha@newmanlaw.com>; Jake Bernstein <Jake@newmanlaw.com>

Cc: Babcock, Chip <cbabcock@jw.com>; Kevin J. Curtis (kjc@winstoncashatt.com) <kjc@winstoncashatt.com>; Brown, Matthew D. <BROWNMD@cooley.com>; Durbin, Christopher <cdurbin@cooley.com>; Smith, Amy McCowan <amsmith@cooley.com>; echung@cmmlaw.com; litigation@cmmlaw.com

Subject: RE: River City v. Kromtech Alliance Corp., et al.: Dates for Telephonic Hearing on Motion for Protective Order

William:

If you intend to withhold documents pending a ruling on a motion for protective order, we will need to first come to an agreement extending the deadline to file an amended complaint and obtain an order on that issue from the court.

I propose that we extend the deadline to amend to 30 days following production. Agreed?

Thanks,  
Leeor

From: Stowe, William [mailto:wstowe@jw.com]

Sent: Wednesday, January 3, 2018 12:25 PM

To: Leeor Neta <Leeor@newmanlaw.com>; docketing <docketing@newmanlaw.com>; Samantha Everett <samantha@newmanlaw.com>; Jake Bernstein <Jake@newmanlaw.com>

Cc: Babcock, Chip <cbabcock@jw.com>; Kevin J. Curtis (kjc@winstoncashatt.com) <kjc@winstoncashatt.com>; Brown, Matthew D. <BROWNMD@cooley.com>; Durbin, Christopher <cdurbin@cooley.com>; Smith, Amy McCowan <amsmith@cooley.com>; echung@cmmlaw.com; litigation@cmmlaw.com

Subject: River City v. Kromtech Alliance Corp., et al.: Dates for Telephonic Hearing on Motion for Protective Order

Leeor:

Pursuant to Local Rule 7.1(h), please let me know what dates and times you are available for a telephonic hearing on CXO Media, Inc.'s Motion for Protective Order between February 5, 2018 and February 16, 2018. Thanks.

Sincerely,

William J. Stowe  
Jackson Walker L.L.P.  
1401 McKinney, Suite 1900  
Houston, Texas 77010  
Direct: (713) 752-4360  
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